

FEDERAL BUREAU OF INVESTIGATION

REGULATORY INSPECTION REPORT (18 U.S.C. §2257)

OF

**Bacchus Video Releasing, Inc.,
also known as Filmco Productions, Inc.
9718 Glenoaks Boulevard #B
Sun Valley, CA 91352**

Date of Inspection: 06/19/2007

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REGULATORY INSPECTIONS REPORT

Report of: SSA Stephen G. Lawrence,
2257 Regulatory Inspections Unit, Crimes Against Children Unit,
Violent Crimes Section, Criminal Investigative Division
Report Date: 07/23/2007
File Number: (F) BACCHUS

PRODUCER INFORMATION

An inspection was conducted of Bacchus Video Releasing, Inc., also known as Filmco Productions, Inc. (Bacchus), pursuant to Title 18, United States Code Section 2257 (18 U.S.C. §2257) and Title 28, Code of Federal Regulations Part 75 (28 C.F.R. Part 75). The inspection was conducted on 06/19/2007 at Bacchus, 9718 Glenoaks Boulevard #B, Sun Valley, CA 91352 [REDACTED], owner and Custodian of Records for Bacchus, telephone numbers (818) 768-9101 and (800) 923-7355, granted access and was present throughout the inspection.

INSPECTION SUMMARY

DVDs produced by Bacchus were ordered via the Internet. Contract inspectors reviewed five DVDs and identified all performers by stage name or by still photographs taken from the DVDs. All DVDs reviewed contained the required 2257 information in the proper format. A total of 41 performers were identified as appearing in the five DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After the inspection on 06/19/2007, it was determined that Bacchus had one 2257 violation. Another 2257 violation was fixed prior to the completion of the inspection.

During this inspection, all provisions of 18 U.S.C. §2257 guidelines were followed by the inspection team.

FINDINGS

1. Bacchus' Internet website, located at www.filmco.com, did not contain the 2257 statement required under 18 U.S.C. §2257.

18 U.S.C. §2257(e)(1) - "Any person to whom subsection (a) applies shall cause to be affixed to every copy of any matter described in paragraph (1) of subsection (a) of this section, in such manner and in such form as the Attorney General shall by regulations prescribe, a statement describing where the records required by this section with respect to all performers depicted in that copy of the matter may be located."

18 U.S.C. §2257(e)(2) - "If the person to whom subsection (a) of this section applies is an organization the statement required by this subsection shall include the name, title, and business address of the individual employed by such organization responsible for maintaining the records required by this section."

28 CFR Part 75.6(a) - "Any producer of any book, magazine, periodical, film, videotape, digitally- or computer-manipulated image, digital image, or picture, or other matter (including but not limited to Internet computer site or services) that contains one or more visual depictions of an actual human being engaged in actual sexually explicit conduct made after July 3, 1995, and produced, manufactured, published, duplicated, reproduced, or reissued on or after July 3, 1995, shall cause to be affixed to every copy of the matter a statement describing the location of the records required by this part..."

28 CFR Part 75.6(b) - "Every statement shall contain:...

- (3) A street address at which the records required by this part may be made available..."

28 CFR Part 75.6(c) - "If the producer is an organization, the statement shall also contain the name, title, and business address of the individual employed by such organization who is responsible for maintaining the records required by this part."

28 CFR Part 75.8(d) - "A computer site or service or Web address containing a digitally- or computer-manipulated image, digital image, or picture, shall contain the required statement on its homepage, any known major entry points, or principal URL (including the principal URL of a subdomain), or in a separate window that opens upon the viewer's clicking a hypertext link that states, "18 U.S.C. 2257 Record-Keeping Requirements Compliance Statement."

2. No photo identification, date of birth or other identifying record was provided for any of the eight performers appearing in "Dude, Where's My Cunt? #5."

18 U.S.C. §2257(a) - "Whoever produces any book, magazine, periodical, film,

videotape, or other matter which (1) contains one or more visual depictions made after November 1, 1990 of actual sexually explicit conduct; and (2) is produced in whole or in part with materials which have been mailed or shipped in interstate or foreign commerce, or is shipped or transported or is intended for shipment or transportation in interstate or foreign commerce; shall create and maintain individually identifiable records pertaining to every performer portrayed in such a visual depiction."

18 U.S.C. §2257(c) - "Any person to whom subsection (a) applies shall maintain the records required by this section at his business premises, or at such other place as the Attorney General may by regulation prescribe and shall make such records available to the Attorney General for inspection at all reasonable times."

28 CFR Part 75.2(a) - "Any producer...shall, for each performer portrayed in such visual depiction, create and maintain records containing the following: (1) The legal name and date of birth of each performer, obtained by the producer's examination of a picture identification card. For any performer portrayed in such a depiction made after July 3, 1995, the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card..."

28 CFR Part 75.4 - "Any producer required by this part to maintain records shall make such records available at the producer's place of business..."

PRODUCER'S RESPONSE TO FINDINGS

During the course of the inspection, and immediately upon being notified by the Lead Inspector that Bacchus' Internet website did not contain the 2257 statement required under 18 U.S.C. §2257, [REDACTED] contacted the appropriate personnel and instructed them to add the required statement. Prior to completing the inspection of Bacchus, the interviewing agent observed the 2257 statement required under 18 U.S.C. §2257 appear on the bottom of Bacchus' website homepage and related links.

On 06/28/2007, the Lead Inspector received a package containing identification documents related to certain of the performers appearing in "Dude, Where's My Cunt? #5." Upon review by the contract inspector, it was determined that a stage name was not provided for true name male actor [REDACTED] (P-1) who appeared in scene number one. The photo identification appeared to resemble an unknown male actor participating in sexually explicit activity in the DVD.

It was also determined that stage names for both of the unknown male actors that participated in sexually explicit activity in scene number two in the DVD were not provided. Photo identification provided was deemed inadequate for comparison by the contract inspector. The names and dates of birth were read and noted; however, due to the poor

quality of the photos, and the stage names not being provided, identification of these two male actors could not be established.

PRE-INSPECTION PROCEDURES

The following pre-inspection procedures were followed:

1. Bacchus was randomly selected from a database of known producers of adult products using a computerized random selection program.
2. A sample of Bacchus DVDs was ordered via the Internet and the method of purchase was documented.
3. All products ordered were reviewed for 18 U.S.C. §2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the DVDs.

INSPECTION PROCEDURES

The following inspection procedures were followed:

1. The inspection began at approximately 11:00 a.m. during regular business hours.
2. SSA Stephen G. Lawrence, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Bacchus.
3. SSA Lawrence explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. SSA Lawrence provided [REDACTED] with a letter explaining the parameters of the inspection and advising Bacchus could be re-inspected at any time if violations were discovered.
5. Prior to the inspection, digital photographs were taken of the business, location of 18 U.S.C. §2257 records storage, and the working area assigned to the inspectors. A disc containing a total of seven photographs was placed in an FD-340 (1A) envelope and maintained with the case file.
6. Contract inspectors reviewed the 18 U.S.C. §2257 records maintained by Bacchus for the five DVDs reviewed, to include the performers appearing therein.
7. Copies were made of the selected performers' identifications indicating date of

birth.

8. The inspection concluded at approximately 1:45 p.m.
9. Digital photographs were taken of the working area used by the inspection team prior to departing the place of business.

RECORDS VERIFICATION SPREADSHEET

**BACCHUS VIDEO RELEASING, INC.,
also known as FILMCO PRODUCTIONS, INC.**

TITLE	PRODUCTION DATE	STAGE NAME	DATE OF BIRTH	TRUE NAME
BIG BOOB LESBIAN COPS	4/13/2001	(P-1)		
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BIG BOOB LESBIAN COPS	4/13/2001			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
BLACK BI NIGHTS	2/1999			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
COCKED AND LOADED 1	12/22/2006			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			
DUDE, WHERE'S MY CUNT? #5	4/15/2003			

**BACCHUS VIDEO RELEASING, INC.,
also known as FILMCO PRODUCTIONS, INC.**

TITLE	PRODUCTION DATE	STAGE NAME	DATE OF BIRTH	TRUE NAME
DUDE, WHERE'S MY CUNT? #5	4/15/2003	(P-1)		
ITTY BITTY TITTY NURSES	5/01/2001			
ITTY BITTY TITTY NURSES	5/01/2001			
ITTY BITTY TITTY NURSES	5/01/2001			
ITTY BITTY TITTY NURSES	5/01/2001			
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ITTY BITTY TITTY NURSES	5/01/2001			

FD-302s

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/22/2007

On 06/19/2007, [REDACTED] a white male, born 05/14/1962, 5'11" tall, 165 pounds, California driver license number [REDACTED], of [REDACTED] was interviewed at his business, BACCHUS VIDEO RELEASING, INC., also known as FILMCO PRODUCTIONS, INC. (BACCHUS), 9718 Glenoaks Boulevard #B, Sun Valley, California, 91352, telephone numbers [REDACTED] and [REDACTED] facsimile number [REDACTED]. After being advised of the identity of the interviewing agent and the nature of the interview, [REDACTED] provided the following information:

[REDACTED] provided the interviewing agent with one CD containing copies of all identification documents stored electronically by BACCHUS for the DVDs entitled "Big Boob Lesbian Cops," "Black Bi Nights," and "Itty Bitty Titty Nurses."

Regarding the DVD entitled "Cocked and Loaded 1," [REDACTED] showed the interviewing agent a copy of an invoice indicating that BACCHUS had purchased copies of the DVD from ADR after the DVDs were replicated. ADR also printed the DVD jackets with BACCHUS' name across the top, but BACCHUS modified the DVD jackets so their company name was in the corner instead. When BACCHUS runs out of the DVD, [REDACTED] has to call ADR for additional copies. BACCHUS is solely a distributor of the DVD and cannot reproduce the DVD. There is no contract between BACCHUS and ADR, as everything is done with a telephone call and a handshake. [REDACTED] advised that BACCHUS did not have any 2257 records pertaining to this DVD, but BACCHUS personnel subsequently provided copies of identification documents for the various performers appearing in the DVD, which they had stored in with other 2257 records.

[REDACTED] utilizes Copernic Desktop Search 2 for BACCHUS' cross-referencing system, which he demonstrated to the interviewing agent, who determined it met the requirements of Title 18, United States Code Section 2257 (18 U.S.C. §2257).

[REDACTED] was notified by the interviewing agent that BACCHUS' internet website, located at www.filmco.com, did not contain the 2257 statement required under 18 U.S.C. §2257. In the presence of the interviewing agent, [REDACTED] telephonically contacted [REDACTED] and advised [REDACTED] to add the required statement

Investigation on 06/19/2007 at Sun Valley, CaliforniaFile # (F) [REDACTED] BACCHUS

Date dictated _____

by SSA Stephen G. Lawrence:sgl *8.2.*

SUBJECT TO PROTECTIVE ORDER

FBI 002168

FD-302a (Rev. 10-6-95)

(F)

BACCHUS

Continuation of FD-302 of

, On 06/19/2007 , Page 2

to BACCHUS' website. Prior to completing the inspection of BACCHUS, the interviewing agent observed the 2257 statement required under 18 U.S.C. §2257 appear on BACCHUS' website homepage and related links.

The CD provided by [REDACTED] was placed in an FD-340 (1-A) envelope and was placed in the case file.

PHOTO LOG / PHOTOS

CAMERA Nikon Coolpix 985
 FILM : ASA Digital
 ROLL No.

LENS - Normal - N
 Wide - W
 Macro - M
 Tele. - T

LIGHT - Available - A
 Elec. Strobe - E
 Flashbulb - F

Photo No.	Lens	Light	SS	f - stop	Description	Photo Log Sketch
1					Title pg - Bacchus Releasing Inc. 6/19/2007	
2					1718 front of adult video warehouse outlet	
3					sign in front + door "B" Bacchus Video	
4					2257 cabinets - hard copies	
5					computer where digital records kept	
6					Break room - before inspection	
7					Break room - after inspection	
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REMARKS

BACCHUS, AKA Filmco, 06/19/2007
 9718 GLENOAKS BOULEVARD, SUN VALLEY, CA 91352
 PHOTOGRAPHER: [REDACTED]

INSPECTION COMPLIANCE DETERMINATION

Bacchus Video Releasing, Inc., also known as Filmco Productions, Inc., was determined to be out of compliance with 18 U.S.C. §2257 and 28 C.F.R. Part 75.